## Federal Defenders OF NEW YORK, INC.

52 Duane Street-10th Floor, New York, NY 10007 Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton
Executive Director
and Attorney-in-Chief



November 19, 2012

## VIA HAND DELIVERY

The Honorable Colleen McMahon United States District Court Southern District of New York 500 Pearl Street New York, New York 10007

Re: <u>United States v. Paul Ceglia</u> 12 Mag. 2842 (CM)

Dear Judge McMahon:

I write on behalf of my client, Paul Ceglia, to respectfully request that the Court modify the bail conditions imposed on October 31, 2012. The Government consents to this request.

The following bail conditions were initially imposed by the Court:

A \$250,000 personal recognizance bond co-signed by one financially responsible person and the defendant's mother and father, surrender of travel documents with no new applications, the defendant's wife and children to surrender their passports, the posting of all of the defendant's parents' real estate and the defendant's property, access to the defendant's home and office computers, home incarceration, and travel restricted to a 15 mile radius of the defendant's home and the Southern District of New York for court appearances.

Mr. Ceglia was released on November 9, 2012 and has been in full compliance with the conditions of his release.

Mr. Ceglia seeks the Court's permission to modify his bail conditions to include "home detention" in place of "home incarceration." Under home detention, Mr. Ceglia will be allowed

to leave his home for work and to attend to family, religious, medical, educational, or legal obligations upon notification and permission from Pretrial Services. Mr. Ceglia will continue to be monitored by Pretrial Services both electronically at home and via GPS outside of the home.

We also request that the court amend Mr. Ceglia's travel restrictions to included travel within the Western District of New York for court appearances and meetings with Pretrial Services. All other travel restrictions will remain in effect.

Both the Government and Pretrial Services consent to this request.

Thank you for your consideration in this matter.

Respectfully submitted,

David E. Patton

Attorney for Paul Ceglia Tel.: (212) 417-8738

so ordered:

11/20/12

HONORABLE COLLEEN MCMAHON
United States District Judge

cc: Christopher D. Frey/Janis M. Echenberg, Assistant United States Attorneys

Pretrial Services, Western District of New York